

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY LITIGATION**

**No. 2:12-md-02323-AB
MDL No. 2323**

**Kevin Turner and Shawn Wooden, on behalf of
Themselves and others similarly situated,**

Plaintiffs,

v.

**National Football League and NFL Properties, LLC,
Successor-in-interest to NFL Properties, Inc.,**

Defendants.

THIS DOCUMENT RELATES TO:

Pope McGlamry PC

v.

SPID 10001915 (R.B.)

**Attorney Lien Dispute
(Lien Dispute No. 00289)**

**POPE MCGLAMRY'S BRIEF REPLY TO COLLINS & TRUETT'S RESPONSE
TO ORDER TO SHOW CAUSE**

Collins & Truett Responded to United States Magistrate Judge David A. Strawbridge's Order to Show Cause (DE 12158, July 7, 2023), on July 28, 2023 (DE 12193) ("Response"). Pope McGlamry requests Leave of Court to file this brief Reply, showing the Court the following:

Essentially, Collins & Truett's Response is that its conduct in the course of the lien dispute as to SCM 1001915 was an isolated and uncharacteristic reaction fueled by an overreacting client, which it contends was "certainly not the norm." Pope, McGlamry is

compelled to file this Reply because it has information showing that the Response is disingenuous and untrue.

Pope McGlamry's involvement in the NFL concussion litigation pre-dates the MDL consolidation before this Court. Mike McGlamry served on the Plaintiff's Steering Committee and several sub-committees thereof, and has represented, and continues to represent numerous former players. Given the widespread poaching of former NFL players following the announcement of the Settlement, Pope McGlamry has been involved in several NFL lien disputes, but has never encountered anything approaching the hostility, threats, and abuse from Mr. Collins.¹

In fact, upon receiving the first communication from Mr. Collins on December 5, 2022 (attached hereto as Exhibit A), Mike McGlamry reached out to several lawyers representing other players, informing them that Mr. Collins had written a belligerent email threatening a Bar complaint and a motion for sanctions if Mr. McGlamry did not withdraw his lien, and asking if any of them had similar experiences with Mr. Collins.

Several lawyers confirmed that threatening and abusive conduct and actions by Collins & Truett were the norm. In fact, one lawyer provided a copy of a similarly menacing communication from Collins & Truett as to an NFL lien dispute.² This e-mail from Mr. Collins threatened bar complaints and an "outing" in this Court against the lawyer with the lien, again blaming purportedly angry clients for the tone of the communication. It thus belies the Response

¹ Although the communications to Pope McGlamry purport to come from Mr. Collins, Collins & Truett's time records, submitted with its Response, indicate that Mr. Collins had little or no involvement in representing SCM 1001915.

² If the Court wishes to review this communication in its entirety, Pope McGlamry is happy to provide the Court a copy for review in camera. However, to protect the privacy of the SCM involved in the other lien dispute, the email is not attached to this public filing.

contentions that Mr. Collins' communications with Mr. McGlamry were an isolated event, or outside of the norm.

Respectfully submitted on this 1st day of August, 2023.

/s/ Michael L. McGlamry
Michael L. McGlamry
Georgia Bar No. 492515
POPE, MCGLAMRY, KILPATRICK
MORRISON & NORWOOD, PC
3391 Peachtree Road N.E., Ste. 300
Atlanta, GA 30326
Tel. 404-523-7706
efile@pmkm.com